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**VIA ECF**

Hon. André M. Espinosa, U.S.M.J.  
U.S. District Court District of New Jersey  
50 Walnut Street  
Newark, NJ 07101

Re: ***Pallazi, et al. v. Cigna Health & Life Insurance Co.***  
**Case No. 22-cv-6278-JMV-AME**

Your Honor:

This firm represents Defendant Cigna Health and Life Insurance Co. in the above-referenced matter. We write jointly with Plaintiffs to request that the Court enter the enclosed proposed Discovery Confidentiality Order (“DCO”), attached hereto as Exhibit A.

In accordance with Your Honor’s Civil Case Management Order ¶ 7, attached as Exhibit B is a redline comparison of the proposed DCO and Appendix S to the Local Rules. The parties have added provisions related to the designation of certain documents and information as “Confidential Health Information” or “Confidential PHI”, which is intended to provide protection sufficient to constitute a Qualified Protective Order under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) and associated regulations. *See, e.g.*, Ex. A ¶¶ 1, 7, 8. In addition, the proposed DCO adds provisions regarding the receipt of confidential information by an arbitrator, mediator, or discover master. *See id.* ¶¶ 4(3), 5(f). Finally, the parties have agreed that the proposed DCO is binding on the parties through execution of their counsel, so that the parties may proceed with discovery. *See id.* ¶ 20.

Accordingly, the parties respectfully request that the Court enter the proposed DCO. Should Your Honor have any questions, please do not hesitate to have a member of your staff contact me. We thank you for Your Honor’s consideration of this request.

Respectfully submitted,

s/ Caroline E. Oks

Caroline E. Oks

cc: All Counsel of Record (via ECF)